

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD/SN)
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This document relates to: *Estate of John P. O’Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.*, 04-cv-1922 (GBD) (SN) (S.D.N.Y.)
 All Actions

**SUPPLEMENTAL DECLARATION OF JERRY S. GOLDMAN, ESQ.
IN FURTHER SUPPORT OF PLAINTIFFS’ OPPOSITION TO GOVERNMENT’S
MOTION**

I, Jerry S. Goldman, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a shareholder at Anderson Kill P.C., attorneys for the named Plaintiffs the Estate of John P. O’Neill, Sr., John P. O’Neill, Jr., Christine O’Neill, Carol O’Neill, the Estate of Dorothy O’Neill, and the Estate of John F. O’Neill in the above-captioned action, in their individual capacities and as putative class representatives, as well as several thousand individuals, in both their individual capacities as family members (spouses, children, parents, siblings) of those who lost their lives (as well as personal representatives of family members who were alive on 9/11/2001 who subsequently passed away, and as personal representatives of the estates of over 400 individuals who perished on 9/11.(“Clients” and with the putative class “O’Neill Plaintiffs”).¹

I am familiar with the facts and circumstances of this case and the rest of the multi-district

¹ I also represent the personal representative of a person who died as a result of injuries suffered on 9/11 (cancer) and an individual who was serious injured on 9/11 who is also the son of the decedent, John Patrick O’Neill.

litigation; I am a member of the Plaintiffs Executive Committee; and I am admitted to practice in this Court.

2. I am filing this declaration to supplement the record, and the declaration which I filed on March 31, 2020 (ECF No. 6109).

3. As indicated in ECF 6109, at approximately 5:00 P.M. on March 30, 2020, I arranged to send to as many of my Clients for whom we had an email address, an electronic communication. Accompanying that communication was a copy of a Declaration, attached hereto and incorporated here as Exhibit “A” (“Declaration”). I understand that such communication was received by my clients at around 7:00 PM, EST., on March 30, 2020.

4. From the time of their receipt, until 5:00 P.M (EST) on this March 31, 2020, we received a very large number of electronic responses from my Clients to that communication, accompanied by either signed copies of the Declaration, or by emails indicating that we should advise the Court that they have authorized us to sign/tender it on their behalf. At 9:00 AM of March 31, 2020, we had over 700 responses and I arranged for a team of over 4 paralegals and associates to process them.

5. During the course of March 31, additional responses were continuously being received. As indicated in ECF 6019, we had processed responses from 809 clients had authorized us to file the Declaration on their behalf, by 5:00 PM, and still had a backlog of additional 175 emails which had not yet been reviewed. We filed the initial declaration (ECF 6109) based on that available material.

6. The responses continued to flow into our in-box and we have continued to process them. We have supplemented Exhibit “B” with all responses received as of 2:00PM on April 1, 2020. In addition, I had the associates and paralegals review to the chart to make sure

that those who were pursuing claims in both a representative and individual capacity were properly indicated. For example, as originally filed Mrs. Christine O'Neill was listed solely as spouse; we have corrected Exhibit B to indicate that she is pursuing claims for her late husband's mother and father, as administrator of their estates. A few additions were a result of that process.

7. Attached hereto and incorporated herein, as Exhibit "B" is a listing of those approximately 1023 Clients who have authorized us, in writing, to tender the Declaration as signed or have been physically signed the Declaration, which have been processed by 2:00 PM today.

Dated: April 1, 2020
New York, NY

/s/ Jerry S. Goldman
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